

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE WESTERN DISTRICT OF PENNSYLVANIA

3                   ROWENA WAGNER,  
4                   Plaintiff

5                   v.

6                   Case No. 04-264 Erie

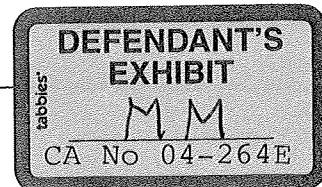
7                   CRAWFORD CENTRAL SCHOOL DISTRICT;  
8                   CRAWFORD CENTRAL SCHOOL BOARD;  
9                   MICHAEL E. DOLECKI, SUPERINTENDENT;  
10                  CHARLES E. HELLER, III, ASSISTANT  
11                  SUPERINTENDENT,  
12                  Defendants

13                  and

14                  THE CRAWFORD CENTRAL EDUCATION  
15                  ASSOCIATION,  
16                  Defendant

17                  Deposition of DANIEL HOOTMAN, taken before  
18                  and by Sondra A. Black, Notary Public in and for the  
19                  Commonwealth of Pennsylvania, on Thursday, September 29,  
20                  2005, commencing at 10:12 a.m., at the offices of  
21                  Crawford Central School District, 11280 Mercer Pike,  
22                  Meadville, Pennsylvania 16355.

23  
24  
25                  Reported by Sondra A. Black  
                        Ferguson & Holdnack Reporting, Inc.



1           Q. No members of the Union representatives have ever  
2 sat on the committees to screen the applicants for a teacher  
3 position?

4           A. Not to my knowledge.

5           Q. Not to your knowledge.

6           A. Not to mine.

7           Q. Ms. Good yesterday testified -- you know her?  
8 Director of curriculum?

9           A. Yes.

10          Q. Testified that there is a prescreening method for  
11 identifying candidates for teaching positions, and as best as  
12 I understand testimony, it's informal by which she said  
13 principals identified candidates, I think maybe others. Are  
14 you familiar with that process?

15          A. No.

16          Q. Do you know of any instance where members of the  
17 Union, including teachers, have identified candidates or  
18 applicants for teacher positions to be interviewed by --

19          A. I have not. I'm not --

20          Q. Has it ever come to your attention?

21          A. No, it hasn't.

22          Q. You're not familiar with the process by which that  
23 possibly candidates identified --

24          A. No.

25          Q. -- and referred for screening?

1 A. No.

2 Q. Or interview -- to be interviewed?

3 A. No.

4 Q. Has the Union ever gone on record to criticize or  
5 objected to hiring practices by the School District for any  
6 reason, for discrimination, nepotism, any -- any reason?

7 A. Not to my knowledge, as president.

8 Q. You never objected --

9 A. No. Not to my knowledge. Since I've been  
10 president.

11 Q. How about before you became president?

12 A. Well, definitely not then.

13 Q. Well, I mean, you had been a teacher -- you've been  
14 in the system, you've been a member of the Union, right?

15 A. Yeah.

16 Q. For several years, right?

17 A. Yeah. But I -- I wasn't active, you know. I was --  
18 I was just a member. I wasn't -- I wasn't involved in -- in  
19 chairman of committees or anything like that.

20 Q. But, I mean, if some kind of written objection had  
21 been filed by the --

22 A. I'm not --

23 Q. -- Union --

24 A. I'm not aware of anything like that.

25 Q. -- against some practice -- expressing some

1 disapproval of some practice -- hiring practices on the part  
2 of the administration or the School District, you would know  
3 about it, right? Even as a member, right? Maybe in a  
4 letter -- in a newsletter.

5 A. I'm not aware of anything like that.

6 Q. You're not aware of any instance?

7 A. No. No.

8 Q. Are you familiar with the School District's policy  
9 by which substitute teachers are assigned based upon the  
10 request of a teacher who might need to take a leave --  
11 sabbatical leave, for example? Medical leave? Do you  
12 understand the practice by which the --

13 A. Only as far as what I've read in -- in this  
14 paperwork.

15 Q. I'm saying --

16 A. Prior to that, no.

17 Q. How long have you been a teacher?

18 A. This is my 30th year.

19 Q. 30th year as a teacher. Okay. So it's not uncommon  
20 that teachers take leaves for different reasons, right?

21 A. Right.

22 Q. Medical or otherwise, right?

23 A. Right.

24 Q. In the course of your -- you have taken -- have you  
25 taken leaves?

1 A. No.

2 Q. You haven't?

3 A. No.

4 Q. Well, your colleagues, okay -- you know your  
5 colleagues have taken leave, right?

6 A. Right.

7 Q. Well, to your understanding, what is customary -- in  
8 terms of when they take leave that they ask for someone to  
9 replace them, is that customary?

10 A. But see, nothing like that has come across saying,  
11 hey, Dan, I'm requesting this person. I don't even know that  
12 many teachers.

13 Q. You've never had the opening?

14 A. No.

15 Q. What about your colleagues?

16 A. Well, I can't speak for them, but it's not something  
17 that somebody's come to me for. My colleagues, the science  
18 department I'm in, no one -- I can't think of anyone who's  
19 taken a long-term leave, except our department head, and that  
20 was seven years ago. And he never said anything to the --  
21 all we know is he was on a sick leave.

22 Q. What about short-term leave?

23 A. Short-term leaves? You mean how long? A week? Two  
24 weeks?

25 Q. What I'm asking you is this -- let me make it clear

1 as I possibly can. People take leaves -- if you don't take  
2 leaves, it's unusual to me. Where I work people do take  
3 leaves, you know, medical leaves. That has happened here,  
4 right? Your 30 years as a teacher, right?

5 A. Oh, yeah. Sure.

6 Q. All right. Now, in just a water-fountain  
7 conversation from time to time, over your 30 years experience  
8 as a teacher in the system, when people take leave, how is it  
9 usually done?

10 A. See, I -- I can't answer that because I don't know  
11 how they're filled. I don't know how they fill positions or  
12 how they --

13 Q. You don't know anything about that?

14 A. No. No. I'm not privy to that. You know, it's,  
15 somebody goes on leave and there's a substitute teacher  
16 there.

17 Q. Yeah.

18 A. The most I know is that, okay, this person has  
19 cancer, you know, and they're going to be gone. But I don't  
20 know anything about how it's filled or anything like that.

21 Q. But you never had a conversation with a colleague  
22 and said, how is it done? I'm going on leave and who is  
23 going to replace you then?

24 A. No.

25 Q. Who did you ask for to replace you?

1 A. No.

2 Q. That has never --

3 A. No. No.

4 Q. That would never have been a matter of discussion in  
5 30 years?

6 A. Not for me it hasn't.

7 Q. As a member of the Association -- president of the  
8 Association, you've been involved in negotiating collective  
9 bargaining agreement?

10 A. Yes.

11 Q. You have?

12 A. Yes.

13 Q. How often have you been involved? What is the  
14 extent of your involvement?

15 A. This one here. The latest agreement.

16 Q. And you, of course, represented the Association?

17 A. Yes.

18 Q. What was your official capacity when you sat across  
19 the table?

20 A. President of the Education Association.

21 Q. During the course of those negotiations, any issues  
22 arise in the subject of negotiation involving the hiring of  
23 minority teachers there?

24 A. No. Not in this present contract that I -- no.  
25 Definitely not.